



STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



EDMUND G. BROWN JR.
GOVERNOR

September 19, 2017

Ms. Linda Haugan, Assistant County Administrator
San Bernardino County Human Services System
385 N. Arrowhead Drive, 5th Floor
San Bernardino, CA 92415-0140

Dear Ms. Haugan:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of June 2017. Enclosed is the final report on the review.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with ADA website accessibility, we also require the CAP to be submitted electronically as a Word document via email at crb@dss.ca.gov.

We will provide a copy of your report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published on our website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>.

If you need technical assistance in the development of your CAP, please feel free to contact Claudia Cabrera at (916) 654-1047. You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

Original signed by Laurie Mosher

LAURIE MOSHER, Acting Manager
Civil Rights Unit
Family Engagement and Empowerment Division

Enclosure

c: Shelia Jackson, Civil Rights Coordinator

Kim McCoy Wade, Chief
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Carlos Ocampo, Chief
Field Operations Bureau

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
San Bernardino County Human Services**

**Conducted on
June 12-16, 2017**

**California Department of Social Services
Family Engagement and Empowerment Division**

**Civil Rights Unit
744 P Street, M.S. 8-16-70
Sacramento, CA 95814
(916) 654-2107**

Reviewer: Claudia Cabrera

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Unit (CRB) staff was to assess the San Bernardino County Human Services with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on June 12-16, 2017. An exit interview was held on June 16, 2017, to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
San Bernardino TAD	2050 Massachusetts Ave, San Bernardino	CalFRESH, CalWORKs, WTW	Spanish
Rancho DAAS	9445 Fairway View Place, Rancho Cucamonga	IHSS/APS	Spanish
San Bernardino Children's Services	1094 S. E. Street, San Bernardino	Children's Services	Spanish
Colton TAD	1900 W. Valley Blvd, Colton	CalFresh, CalWORKs, Welfare to Work	Spanish
Ontario Customer Call Center	Ontario	Call Center	Spanish
Program Integrity	1111 Mill Street, San Bernardino	Fraud Case File Reviews	Spanish

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the **2017** Civil Rights Compliance Plan submitted by the County.

- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of civil rights coordinator
- Survey of program managers
- Case file reviews
- Facility inspections
- Discussion with community advocate groups. In this review the following organization(s) were contacted for feedback.

Inland Counties Legal Services
1040 Iowa Ave, Suite 101
Riverside, CA 92507
(951) 368-2530 ext. 2541

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Program Accessibility for Clients with Disabilities (physical, mental, learning, visual or hearing impairment, etc.)
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	15	12
Children Social Workers	5	3
Adult Program Workers	3	1
Receptionist/Screeners	3	2
Total	26	18

Civil Rights Coordinator and Program Manager Surveys

Number of surveys distributed	10
Number of surveys received	10

Reviewed Case Files

English speakers' case files reviewed	10
Non-English or limited-English speakers' case files reviewed	120
Languages of clients' cases	Vietnamese, Cantonese, Spanish, Arabic, Russian/Armenian, Samoan
Reasonable Accommodation Cases	10

Sections III through IX of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section X evaluates the county's Call/Service Centers services provided to non-English speaking clients and clients with a disability.

Section XI reviews the county's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

Section XII highlights issues pointed out by Community Input and summarizes Reviewer Observations.

Section XIII of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Comments
Does the county accommodate clients by flexing/extending their hours or allowing applications to be mailed in?	X		Staff can accommodate clients by flexing their hours upon request and approval from management. Applications can be mailed in; clients can scan them via the kiosks located in the lobby; or they can be submitted online through the C4Yourself website.
Can clients, including those with disabilities, access services when unable to go to the office?	X		There are several ways clients can access services and information if they are unable to go to an office. The County of San Bernardino website provides information regarding the services available to clients. Clients can also access C4Yourself website to submit applications, check the status of their case or get benefit information.
Does the county ensure the awareness of available services for individuals in remote areas?	X		Outreach services are disseminated with the use of a local radio station, participation in Community and Faith Based Organizations, via the 211 system, as well as stationed workers at the Department of Public Health.

Signage, posters, pamphlets	Yes	No	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 8/16)?	X		

Signage, posters, pamphlets	Yes	No	Comments
Is the pamphlet distributed and explained to each client at intake and re-certification?	X		Staff indicated they distribute the PUB 13 as part of the application packet and it is explained to clients during intake and recertification.
Is the current version of Pub 13 available in Arabic, Armenian, Cambodian, Chinese, English, Farsi, Hmong, Japanese, Korean, Lao, Mien, Portuguese, Punjabi, Russian, Spanish, Tagalog, Ukrainian, and Vietnamese?	X		For the office locations that only have the threshold languages of the PUB 13's printed, there is a notice informing clients of the availability of other languages, upon request.
Is the Pub 13 available in large print (English and Spanish), CD, and Braille?	X		
Were the current versions of the required posters present in the lobbies?	X		
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	X		

B. Corrective Actions

None.

C. Recommendation

The county is required to use the latest version of each of the referenced documents. For your information, the most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	08/16
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact the Civil Rights Unit to receive the most recent versions, or download the Pub 13 from the CRB website

<http://www.cdss.ca.gov/civilrights/entres/forms/English/pub13.pdf>.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A. Findings and Corrective Actions

1. Facility Location: 2050 N. Massachusetts, San Bernardino

Facility Element	Findings	Corrective Action
Parking	The is no "unauthorized parking" sign at entrance to off-street accessible parking.	<p>An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8) pg.170</p> <p>The additional sign shall not be less than 17" wide x 22"</p>

Facility Element	Findings	Corrective Action
	<p>The is no additional signage or language below the symbol of accessibility “Minimum Fine \$250” sign.</p>	<p>high. Fig. 4 (CA T24 11B-502.8.1) pg. 170</p> <p>The additional sign shall clearly state in letters with a min. height of 1” the following: “Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner’s expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____.” (CA T24 11B-502.8.2) pg. 170</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2) pg. 170</p> <p>Additional language or an additional sign below the International Symbol of Accessibility shall state “Minimum Fine \$250”. (CA T24 11B-502.6.2) pg. 169</p>
Client lobby	The “Employment Services” sign is only in English.	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div. 21-107.212)</p>

Facility Element	Findings	Corrective Action
Stairway	Contrasting strip on the stairs is faded and does not provide a clear contrast.	<p>Interior stairs shall have the upper approach and lower tread marked by a stripe providing clear visual contrast. (CA T24 11B-504.4.1) pg. 235</p> <p>Exterior stairs shall have the upper approach and all treads marked by a stripe providing clear visual contrast. (CA T24 11B-504.4.1) pg. 235</p> <p>The stripe shall be a min. of 2" wide to a max. of 4" wide placed parallel to, and not more than 1" from, the nose of the step or upper approach. (CA T24 11B-504.4.1) pg. 235</p> <p>The stripe shall extend the full width of the step or upper approach and shall be of material that is at least as slip resistant as the other treads of the stair.</p>
Restroom	<p>Men's Restroom-1st Floor</p> <p>There is no proper signage on the wall.</p> <p>Men's Restroom-2nd Floor</p> <p>Sign on door is high at 64."</p>	<p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side. (CA T24 11B-703.4.2) (ADA 703.4.2) pg. 311</p> <p>Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall. (CA T24 11B-703.4.2) (ADA 703.4.2) pg. 311</p> <p>The symbol shall be mounted at 58" min. and 60" max. above the finish floor or ground surface measured from the centerline of the symbol. (CA T24 11B-703.7.2.6) pg. 310</p>

Facility Element	Findings	Corrective Action
	<p>Door pressure is excessive at 12lbs.</p> <p>Women's Restroom-1st Floor</p> <p>Sign on door is low at 55".</p> <p>Two of the three pipes under the sink need to be re-wrapped.</p> <p>Women's Restroom-2nd Floor</p> <p>Door pressure is excessive at 12lbs.</p>	<p>The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4) pg. 224</p> <p>The symbol shall be mounted at 58" min. and 60" max. above the finish floor or ground surface measured from the centerline of the symbol. (CA T24 11B-703.7.2.6) pg. 310</p> <p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. (CA T24 11B-606.5) (ADA 606.5) pg. 330</p> <p>There shall be no sharp or abrasive surfaces under lavatories and sinks. (CA T24 11B-606.5) (ADA 606.5) pg. 330</p> <p>The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4) pg. 224</p>

B. Recommendation

None.

2. Facility Location: 9445 Fairview Place, Rancho Cucamonga

Facility Element	Findings	Corrective Action
Parking	The "unauthorized parking" sign is missing the phone number for towing.	The additional sign shall clearly state in letters with a min. height of 1" the following: "Unauthorized vehicles

Facility Element	Findings	Corrective Action
	<p>All accessible parking signs are low at 77"</p> <p>The is no van-accessible parking spot.</p>	<p>parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____. (CA T24 11B-502.8.2) pg. 170</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2) pg. 170</p> <p>Signs located within an accessible route shall be a min. of 80" above the finish floor or ground surface measured to the bottom of the sign. (CA T24 11B-502.6 (Exc.)) pg. 169</p> <p>For every 6 or fraction of 6 parking spaces at least 1 shall be a van parking space. (CA T24 11B-208.2.4) (ADA 208.2.4) pg. 176</p>
Outside signage	The is no ISA sign.	<p>Pictograms and their field shall have a non-glare finish. (CA T24 11B-703.6.2) (ADA 703.6.2) pg. 376</p> <p>Pictograms shall contrast with their field with either a light pictogram on a dark field or a dark pictogram on a light field. (CA T24 11B-703.6.2) (ADA 703.6.2) pg. 376</p>

B. Recommendation

None.

3. Facility Location: 1094 S. E. Street, San Bernardino

Facility Element	Findings	Corrective Action
Parking	The words “no parking” are faded and need to be repainted.	<p>The words “NO PARKING” shall be painted on the surface each access aisle.</p> <p>(CA T24 11B-502.3.3) pg. 176</p> <p>This notice shall be painted in white letters a min. of 12” in height and located to be visible from the adjacent vehicular way. (CA 11B-502.3.3) pg. 176</p>

B. Recommendation

None.

4. Facility Location: 1900 W. Valley Blvd, Colton

No findings.

B. Recommendation

None.

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial

number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages if the forms and materials are provided by CDSS in that language, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Comments
Does the county identify a client's language need upon first contact? How?	X		Staff will review the application for language preference and will follow up during initial contact with client.
Does the county use a primary language form?		X	Staff were not aware of a primary language form.
Does the client self-declare on this form?		NA	
Are non-English- or limited-English-speaking clients provided bilingual services?	X		Bilingual Staff are available to assist clients for in person interpreting or they have direct access to over the phone interpretive services.
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X		For IHSS the Request for Translation and Interpreter Services (RTIS 49) form is used to request and schedule an interpreter for home visits. If an over the phone interpreter is needed, staff will contact Shelia Jackson, CRC, to connect to an interpreter.
Does the county have a contracted language line provider, a county	X		Staff are instructed to contact Shelia Jackson,

Question	Yes	No	Comments
interpreter list, or any other interpreter process?			CRC, for over the phone interpretive services.
Is there a delay in providing interpretive services?	X		Staff stated they do not have direct access to over the phone interpreters.
Are county interpreters certified?	X		Bilingual staff are certified by County Human Resources for proficiency in both written and verbal communication.
Does the county have adequate interpreter services?	X		
Does the county allow minors to be interpreters? If so, under what circumstances?		X	
Does the county allow the client to provide his or her own interpreter?	X		
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X		Staff will observe for any signs of difficulty with the client-provided interpreter.
Does the county use a Release of Confidentiality Information form for client-provided interpreters?	X		
Does the county use the CDSS-translated forms in the clients' primary languages?	X		
Is the information that is to be inserted into NOA translated into the client's primary language?	X		
If language to be inserted into NOA is not available, is there a procedure to ensure information translated to client's primary language?	X		
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X		

Question	Yes	No	Comments
Does the county identify a client with a disability (physical, mental, or learning)?	X		
Does the county assist clients with self-identifying a disability?	X		In the WTW program the OCAT (Online CalWORKs Assessment Tool) is an in-depth questionnaire that allows clients to self-identify their potential or known learning, mental or physical disability.
Does the county have a policy and procedure in place for assisting clients with a disability (physical, mental, or learning)?	X		San Bernardino County has developed an ADA policy that provides staff with guidelines on how to provide access to County of San Bernardino programs and services for individuals with disabilities in accordance with the ADA.
Does the county offer reasonable accommodations to clients with a disability (physical, mental, or learning)?	X		All staff interviewed were aware on how to assist a client with a disability.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X		<p>In the WTW program the OCAT (Online CalWORKs Assessment Tool) is an in-depth questionnaire that allows clients to self-identify their potential or known learning, mental or physical disability.</p> <p>All other staff stated they would offer and provide assistance to clients by reading out loud to them, helping them fill out forms and noting the preferred method of assistance in the C-IV case journal.</p>

Question	Yes	No	Comments
Does the county offer a screening for learning disabilities?	X		The WTW program provides screening for learning disabilities.
Is there an established process for offering a screening?	X		Yes, WTW program.
Is the client identified as having a learning disability referred for an evaluation?	X		

B. Corrective Actions

Area of Findings	Corrective Actions
Timely Services	San Bernardino County must ensure that bilingual/interpretive services are prompt and without undue delay. Div. 21-115
Interpretive Services and Accessibility	San Bernardino County shall ensure that administrative practices do not have the effect of denying non-English speaking persons and individuals with disabilities equal access to and participation in the available programs and activities. Div. 21-115.3

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

How item is Documented Item	Adult Programs (IHSS and/or APS)	CalWORKs & Employment Services	Non-Assistance CalFresh	Fraud	Children Services
Ethnic origin documentation	SOC 341, Report of Suspected Elder Abuse, IHSS 261-B form, IHSS	SAWS 2Plus	SAWS I	C-IV Case Summary	IN-ERREFR

How item is Documented Item	Adult Programs (IHSS and/or APS)	CalWORKs & Employment Services	Non-Assistance CalFresh	Fraud	Children Services
	Screening and Referral Form, Central Intake Unit.				
Method of identifying client's primary language	Interpreter/ Special Needs (DAAS ITP 100) form	SAWS 2Plus, C-IV Red Indicator Flag in Case Summary Page	SAWS I, C-IV Red Indicator Flag in Case Summary Page	C-IV Case Summary	IN-ERREFR, Case Transfer Summary (CFS 159.6)
Method of documenting client's primary language	Case File Activity Log	SAWS 2Plus, C-IV Red Indicator Flag in Case Summary Page	C-IV Red Indicator Flag in Case Summary Page	None Found in Cases Reviewed	IN-ERREFR, Delivered Service Log
Method of providing bilingual services and documentation	Case File Activity Log	C-IV Case Journal	C-IV Case Journal	None Found in Cases Reviewed	IN-INVDOC (Investigation Narrative), Case Notes
Client provided own interpreter	Case File Activity Log	C-IV Case Journal	CW2200 (2/14) Form, Consent for Release of Information	None Found in Cases Reviewed	IN-INVDOC (Investigation Narrative), Case Notes
Method to inform client of potential problem using own interpreter	Case File Activity Log	CW2200 (2/14) Form, Consent for Release of Information	CW2200 (2/14) Form, Consent for Release of Information	None Found in Cases Reviewed	IN-INVDOC (Investigation Narrative), Case Notes

How item is Documented Item	Adult Programs (IHSS and/or APS)	CalWORKs & Employment Services	Non-Assistance CalFresh	Fraud	Children Services
Release of information to Interpreter	Case File Activity Log	CW2200 (2/14) Form, Consent for Release of Information	CW2200 (2/14) Form, Consent for Release of Information	None Found in Cases Reviewed	IN-INVDOC (Investigation Narrative), Case Notes
Individual's acceptance or refusal of written material offered in primary language	ITP 100 form	C-IV Case Journal	C-IV Case Journal	None Found in Cases Reviewed	IN-INVDOC (Investigation Narrative), Case Notes
Documentation of minor used as interpreter	Case File Activity Log	C-IV Case Journal	C-IV Case Journal	None Found in Cases Reviewed	IN-INVDOC (Investigation Narrative), Case Notes
Documentation of circumstances for using minor interpreter temporarily	None Found in Cases Reviewed	C-IV Case Journal	C-IV Case Journal	None Found in Cases Reviewed	IN-INVDOC (Investigation Narrative), Case Notes
Method of identifying client's disability	Interpreter/ Special Needs (DAAS ITP 100) form	C-IV Red Indicator Flag in Case Summary Page	C-IV Red Indicator Flag in Case Summary Page	C-IV Case Flag on Summary Page	CFS CR1, Auxiliary Aid/Interpreter Identification bright orange sticker placed on the front of the case file
Method of documenting clients' disability (physical, mental, or learning)	Case File Activity Log	C-IV Red Indicator Flag in Case Summary Page	C-IV Red Indicator Flag in Case Summary Page	None Found in Cases Reviewed	CFS CR1, Auxiliary Aid/Interpreter Identification bright orange sticker placed on the front of the case file

How item is Documented Item	Adult Programs (IHSS and/or APS)	CalWORKs & Employment Services	Non-Assistance CalFresh	Fraud	Children Services
Method of offering a reasonable accommodation to the client with disability	Case File Activity Log	C-IV Case Journal	C-IV Case Journal	None Found in Cases Reviewed	IN-INVDOC (Investigation Narrative), Case Notes
Method of documenting clients' reasonable accommodation	Case File Activity Log	C-IV Case Journal	C-IV Case Journal	None Found in Cases Reviewed	CFS CR1, Auxiliary Aid/Interpreter Identification bright orange sticker placed on the front of the case file

B. Corrective Actions

Areas of Action	Corrective Action
Documentation if client provided own interpreter	When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div. 21-116.23
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22
General	San Bernardino County must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights, cultural awareness, Section 504, and ADA training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Comments
Are employees trained in the requirement of Section 504 and ADA?		X	
Do employees receive continued Division 21 Training?	X		All staff receive mandatory training every two years.
Do employees understand the county policy regarding a client's rights and procedure to follow when receiving a discrimination complaint?	X		All staff interviewed were aware of the policy and procedure for discrimination complaints.
Does the county provide employees Cultural Awareness Training?	X		Included as part of the Division 21 training.
Do the CSW's have an understanding of Multi-Ethnic Placement Act (MEPA)?	X		
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X		
Does the county provide training on how to identify clients with disabilities (physical, mental & learning)?	X		Included as part of the Division 21 training.
Do employees receive training on reasonable accommodation for clients with disabilities?	X		
Do the employees understand the county policy regarding a client's right to a reasonable accommodation?	X		

B. Corrective Actions

None.

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews, Civil Rights Coordinator, and Program Manager Surveys

Interview and review areas	Yes	No	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X		All staff interviewed were aware of the difference between a program, discrimination and personnel complaint.
Do the employees know who the Civil Rights Coordinator is?	X		All staff interviewed were aware that Shelia Jackson is their Civil Rights Coordinator.
Do the employees know the location of the Civil Rights poster "Everyone is Equal... (Pub 86)" with information as to how and where the clients can file a discrimination complaint?	X		All staff indicated the PUB 86 poster was located in the lobby.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X		

B. Corrective Action

None.

C. Recommendation

None.

IX. VENDOR CONTRACTS

Counties are required to ensure contracted services with contractors, vendors, consultants, and other providers of service, who receive state or federal assistance, include the assurance of compliance agreement.

A. Contracts Review

Number of Contracts Reviewed	13
Number of Contracts w/Assurance of Compliance Agreement	13

B. Corrective Action

None.

X. CALL CENTER EVALUATION

County Call/Service Centers are evaluated to ensure services provided are nondiscriminatory toward non-English speaking clients and clients with a disability (physical, mental, or learning).

A. Findings from Ontario Call/Service Center site visit and interviews.

Question	Yes	No	Comments
Does the County have a Call Center/Service Center?	X		
Is the Call Center/Service Center publically accessible to clients?		X	
Does the Call Center/Service Center answer calls for the entire county, by district, or regional office?	X		
Does the Call/Service Center have an Interactive Voice Response system?	X		
If so, does the Interactive Voice Response system have language options for all county threshold languages?	X		
Does the Interactive Voice Response system have an option to request free interpretive services?	X		
Is the Call/Service Center accessible to clients with a disability (hearing impaired, physical, mental, or learning)?	X		San Bernardino County has the capability for Web Live Chat available to clients who choose to interact via the internet and comfort of their home.
Does the Call/Service Center accommodate clients with a disability (physical, mental, or learning)?	X		

Question	Yes	No	Comments
Are the Call/Service Center calls monitored for quality assurance?	X		Supervisors have the ability to randomly use what's called the Buddy Jack which allows them to listen to calls.
Does the Call/Service Center staff provide services to client's individual case?	X		Staff have full access to C-IV and can take actions on a client's case

B. Corrective Action

None.

XI. COMMUNITY INPUT

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups. The following summarizes their observations, and will provide issues that the county management team can address to improve their operations from a civil rights perspective.

There was no reply from the Advocates who were notified for this review.

XII. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The San Bernardino County Department of Human Services Civil Rights Compliance Plan for the period of June 2017-May 2018 was received on May 31, 2017. It is approved as submitted.

XIII. CONCLUSION

The CDSS reviewer found the San Bernardino County Department of Human Services staff warm, welcoming, informative and very supportive. Particular thanks to Shelia Jackson, Civil Rights Coordinator, for organizing the details of the review. In each District Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the San Bernardino County Department of Human Services in substantial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The San Bernardino County Department of Human Services must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.